

PETITION BEFORE THE FEDERAL COMMUNICATIONS COMMISSION

DOCKET FILE COPY ORIGINAL

SECRETARY

FEDERAL COMMUNICATIONS COMMISSION

1919 M STREET

WASHINGTON DC 20554

FCC MAIL ROOM  
SEP 21 1998  
RECEIVED

IN THE MATTER OF:

RESPONSE TO NOTICE OF PROPOSED  
RULE MAKING IN WT DOCKET 98-143

IN THE SUBJECT NPRM THE COMMISSION SEEKS TO REVISE THE AMATEUR RADIO SERVICE REGULATIONS TO MEET A STATED OBJECTIVE OF REDUCING THE NUMBER OF LICENSE CLASSES FROM SIX TO FOUR. NO REASONS, ECONOMIC OR OTHERWISE, ARE GIVEN FOR THIS OBJECTIVE. IT IS A FACT THAT MUCH OF THE COMMISSION'S COSTS IN SERVING THE AMATEUR SERVICE HAVE BEEN ASSUMED BY VOLUNTEER EXAMINATION COORDINATORS, AND OTHER AUXILIARY VOLUNTEERS, AND THE ECONOMIC BURDEN OF ADMINISTERING THE SERVICE HAS BEEN GREATLY EASED.

THE COMMISSION WOULD LIKE US TO BELIEVE THAT THEIR RESOURCES FOR THE SERVICE ARE STRAINED BEYOND THE BREAKING POINT BY MAINTAINING RECORDS FOR TWO ADDITIONAL CLASSES OF LICENSES THAT ONLY NEED TO BE SERVICED EVERY TEN YEARS.

THE COMMISSION IS RIGHTFULLY CONCERNED THAT THE AMATEUR RADIO SERVICE IS AT A VERY SERIOUS CROSSROADS IN ITS LONG HISTORY. THIS PETITIONER AGREES THAT SOME ACTION MUST BE TAKEN. THE COMMISSION, AND THE AMERICAN RADIO RELAY LEAGUE (ARRL) IN ITS LETTER PROPOSAL, WOULD HAVE US BELIEVE THAT THE NECESSARY CHANGES MAY BE ACCOMPLISHED BY DELETING THE TECHNICIAN PLUS, AND NOVICE CLASS LICENSES, AND A REORGANIZATION OF THE LICENSE REQUIREMENTS. IT IS DIFFICULT TO ENVISION HOW THESE CHANGES WOULD WORK TO THE BENEFIT OF THE SERVICE.

ONE MAY OBSERVE THAT THE SUCCESS OF THE TECHNICIAN CLASS LICENSE HAS BEEN SOLELY THE RESULT OF THE EASY ACCESS PROVIDED BY THE EXAMINATION; ESSENTIALLY AN OPEN-BOOK TEST.

No. of Copies rec'd  
List A B C D E

025

PAGE TWO

RESPONSE TO NPRM WT Docket ~~F98043~~ **F98043** **RECEIVED**  
BY LELAND W. AURICK, W1SE

**SEP 21 1998**

**RECEIVED**

THIS CLASS OF LICENSES WAS SUPPORTED BY THE ARRL AT THE TIME THAT IT WAS BEING CONSIDERED. THEIR INTEREST HAS BEEN SOLELY IN ENLARGING THE UNIVERSE OF AMATEUR RADIO OPERATORS, IN THE VAIN HOPE OF CREATING MORE MEMEBERS. MORE AMATEURS, MORE MEMEBERS! IT HAS NOT WORKED OUT THAT WAY.

AT THE TIME THAT THE TECHNICIAN LICENSE WAS UNDER CONSIDERATION THIS PETITIONER PLEADED FOR RESTRAINT IN MAKING SUCH A DRASTIC MODIFICATION TO THE LICENSE STRUCTURE. IF THE COMMISSION WAS BENT ON HAVING A CODELESS LICENSE, LET IT BE FOR A FINITE TEST PERIOD. A TEST FOR ONE YEAR WAS SUGGESTED.

THE RESULT OF THE TECHNICIAN LICENSE, AS WE HAVE SEEN, HAS BEEN DISENCHANTMENT WITH THE NOVICE CLASS LICENSE, WHICH HAS FALLEN INTO DISUSE. WHY SHOULD A PERSON, WITH ONLY A MINIMAL INTEREST IN AMATEUR RADIO, WORK TO ATTAIN ANYTHING FURTHER THAN THE TECHNICIAN CLASS LICENSE? THE NOVICE LICENSE HAD PREVIOUSLY BEEN THE TRADITIONAL METHOD OF ENTRY INTO THE AMATEUR SERVICE. POSSESSING NINETY PERCENT OF THE FREQUENCY PRIVILEGES AFFORDED TO ALL AMATEURS, THE TECHNICIAN LICENSEE WAS PROVIDED VIRTUALLY NO MOTIVATION TO ADVANCE TO A HIGHER CLASS OF LICENSE. THE INTEREST IS A SOCIAL ONE; TO PUSH A BUTTON AND TALK ON THE RADIO, NOT A DESIRE TO LEARN MORE ABOUT COMMUNICATIONS TECHNOLOGY. THE COMMISSION IS STILL POSSESSED OF THE IDEA THAT THIS LICENSE CLASS WILL BE THE SALVATION OF AMATEUR RADIO. IT WAS NOT WHEN THE LICENSE CLASS WAS ESTABLISHED, AND IT IS NOT NOW.

THIS CLASS OF LICENSE, INVENTED BY THE COMMISSION, HAS HELPED TO PRODUCE THE PRESENT SITUATION; ONE IN WHICH WE FIND THE AMATEUR SERVICE AT THE POINT OF STAGNATION. NOW THE COMMISSION SUGGESTS THAT BY REDUCING THE CODE SPEED REQUIREMENTS, AND MAKING IT EVEN EASIER TO ATTAIN AN AMATEUR LICENSE, THAT THIS WILL SOLVE THE SEVERE PROBLEMS FACING AMATEUR RADIO. IT WILL NOT.

PAGE THREE

RESPONSE TO NPRM DOCKET WT 98-443  
BY LELAND W. AURICK, W1SE

SEP 21 1998

RECEIVED

IN PROPOSING TO REDUCE THE PRESENT 13-WPM AND 20-WPM CODE SPEED REQUIREMENTS TO 5-WPM AND 10-WPM, RESPECTIVELY, THE COMMISSION BELIEVES THAT THESE WILL BE THE MAGIC ELIXIR TO CREATE MORE INTEREST IN THE SERVICE. IN 1936 THE COMMISSION WAS CONVINCED THAT THE MINIMUM CODE SPEED REQUIREMENT SHOULD BE 13-WPM, AND RAISED IT TO THAT SPEED FROM 10-WPM. THE COMMISSION BELIEVES THAT THIS PROPOSED RETROGRADE ACTION WOULD BE IN THE BEST INTEREST OF THE SERVICE. IT IS IMPOSSIBLE TO DEVELOP A RATIONAL ARGUMENT FOR THAT OPINION.

THE COMMISSION PROPOSES TO SUBSTITUTE ADDITIONAL, AND MORE DIFFICULT QUESTIONS ON THE GENERAL, ADVANCED AND AMATEUR EXTRA EXAMINATIONS, AS A KIND OF COMPENSATION FOR THE PROPOSED REDUCTION IN THE CODE SPEED REQUIREMENTS. HOW IS THIS TO BE CALCULATED? WHAT QUESTIONS WOULD BE ASKED THAT COULD BE EQUATED TO REQUIRING AN APPLICANT TO PROVIDE EVIDENCE OF HIS CODE PROFICIENCY AND OPERATING EXPERIENCE AT 13-WPM? AT 20-WPM? ADDITIONAL, EASILY MEMORIZED TECHNICAL QUESTIONS, ARE NOT A SUBSTITUTE FOR DEMONSTRATING OPERATOR PROFICIENCY.

THE COMMISSION PROPOSES TO FURTHER WEAKEN THE STRUCTURE OF AMATEUR RADIO LICENSING BY PROVIDING MORE VOICE FREQUENCIES, FOR LESS EFFORT ON THE PART OF THE APPLICANT. APPARENTLY THE COMMISSION MISTAKENLY ASSUMES THAT THE GRANTING OF SUCH UNEARNED PRIVILEGES WILL PRODUCE BETTER OPERATORS. HAVE WE NOT LEARNED THE LESSON THAT HANDING OUT UNEARNED PRIVILEGES DOES NOTHING TO IMPROVE THE RECIPIENT OR THE SERVICE? EVEN THE CASUAL LISTENER TO ANY OF THE AMATEUR VOICE SEGMENTS WILL OBSERVE THAT EIGHTY-YEAR OLD AMATEUR TRADITIONS ARE BEING ERODED BY THE ACCRETION OF OPERATORS FROM THE CITIZEN RADIO SERVICE WHO FOUND THEIR WAY TO THE AMATEUR SERVICE BY TOO EASY A ROUTE. THEY NEVER STOPPED ALONG THE WAY TO LEARN OF THE MANY AMATEUR OPERATING TRADITIONS. THIS IS ONE OF THE MANY CAUSES OF THE LACK OF CIVILITY TO BE OBSERVED AMONG NEW AMATEURS. THEY BROUGHT IT WITH THEM.

PAGE FOUR

RESPONSE TO NPRM DOCKET WT 98-143  
BY LELAND W. AURICK, W1SE

MUCH OF WHAT IS WRONG WITH AMATEUR RADIO TODAY MAY BE LAID AT THE FEET OF THE COMMISSION

THIS RESPONSIBILITY STARTS WITH AN EXAMINATION PROCESS THAT IS A JOKE, AND INCLUDES WHAT HAS BEEN, FOR YEARS, AN ALMOST TOTAL LACK OF ENFORCEMENT. THESE HAVE HELPED TO CONSUME THE SERVICE. IN ITS EAGERNESS TO ACCOMMODATE HANDICAPPED APPLICANTS, THE COMMISSION HAS MADE IT TOO EASY FOR THE PHYSICIAN-APPROVED CODE EXAMINATION TO BE ABUSED, AS IT OFTEN IS. LACKING A KNOWLEDGE OF THE CODE, THE PHYSICIAN IS UNABLE TO DETERMINE THE CAPABILITY OF AN OPERATOR TO COPY CODE AT ANY SPEED.

WE HAVE WORKED WITH ACCOMMODATED EXAMINATIONS FOR MANY YEARS. THE VOLUNTEER EXAMINERS ARE CAPABLE OF DETERMINING THE ABILITY OF APPLICANTS TO COPY THE CODE, AND THE RESPONSIBILITY FOR THIS ACCOMMODATION SHOULD BE RESERVED EXCLUSIVELY TO THESE PERSONS. PHYSICIAN-APPROVED EXAMINATIONS SHOULD BE DELETED.

NOW THE COMMISSION APPEARS TO BELIEVE THAT THE APPLICATION OF SEVERE MEASURES, WHICH WILL UNFAVORABLY AFFECT EVERY LICENSEE, WILL REPAIR THE NEGLECT OF YEARS.

ESSENTIALLY, THE COMMISSION PROPOSES TO DEMEAN AND WEAKEN THE PRESENT LICENSE CLASSES BY THE REDUCTION OF CODE SPEED REQUIREMENTS. EACH LICENSE WOULD THEREFORE BE OF CONSIDERABLY LESS WORTH TO THE HOLDER THAN WHEN IT WAS ATTAINED.

THE GENERAL CLASS LICENSE.

THIS CLASS WILL BE DEMEANED THE MOST. LICENSEES PROVEN QUALIFICATIONS WOULD BE WEAKENED AND DILUTED BY THE BLENDING OF THE SURVIVING TECHNICIAN PLUS AND NOVICE CLASS LICENSEES. THE WORK THAT THESE OPERATORS WILL HAVE EXPENDED

PAGE FIVE

RESPONSE TO NPRM DOCKET WT 98-143

BY LELAND W. AURICK, W1SE

RECEIVED  
FEB 21 1999  
FEDERAL COMMUNICATIONS COMMISSION

TO GRADUATE TO THE FIRST MEANINGFUL CLASS OF LICENSE WILL BE LOST WITH THE NEW REQUIREMENT AT 5-WPM, AND THE ATTAINMENT OF EQUAL PRIVILEGES BY OTHER LICENSEES OF CONSIDERABLY LESS SKILL AND EXPERIENCE. HOW DOES THE COMMISSION BELIEVE THESE LICENSEES WILL FEEL?

THE ADVANCED CLASS LICENSE.

THIS CLASS OF LICENSE WILL ALSO BE Demeaned, AND WILL SUFFER IN LICENSE CLASS DEGRADATION. THIS PERSON HAD TO PASS AN OPERATOR PROFICIENCY TEST OF 13-WPM TO OBTAIN HIS LICENSE. THE COMMISSION PROPOSES TO REDUCE TO 5-WPM THE REQUIREMENT FOR THIS LICENSE. HOW DOES THE COMMISSION BELIEVE THESE LICENSEES WILL FEEL?

THE AMATEUR EXTRA CLASS LICENSE.

IN 1951, WHEN THE COMMISSION ESTABLISHED THIS CLASS OF LICENSE, IT REFERRED TO THE PROSPECTIVE LICENSEES AS THE 'PIONEERS', AS THE 'EXPERTS', AS THE PEOPLE WHO HAD HELPED TO PUT IT ALL TOGETHER, TO PRODUCE A NATION PRE-EMINENT IN THE FIELD OF COMMUNICATIONS. APPARENTLY, THE COMMISSION NO LONGER FEELS THIS WAY. PERHAPS THE REASON THIS COUNTRY MAY NO LONGER BE CONSIDERED PRE-EMINENT IN THE FIELD OF COMMUNICATIONS HAS SOMETHING TO DO WITH THE WAY THE COMMISSION HAS TREATED THIS CLASS, AND ALL CLASSES, OF AMATEUR RADIO OPERATOR. HOW DOES THE COMMISSION BELIEVE THESE LICENSEES WILL FEEL?

AS A VOLUNTEER EXAMINER, THIS PETITIONER HAS OBSERVED, TIME AND AGAIN, AN APPLICANT FOR THE EXTRA CLASS LICENSE, GUESS, SUCCESSFULLY, SUFFICIENT ANSWERS TO THE CODE EXAMINATION TO PASS THE TEST, WHILE THERE IS NOT ONE COHERENT WORD WRITTEN ON HIS PAPER. ONE IS LEFT WITH THE INESCAPABLE CONCLUSION THAT, WERE THIS PERSON TO BE CONTACTED ON THE AIR, HE WOULD ONLY BE ABLE TO GUESS AT SEVENTY PERCENT OF WHAT WAS SENT TO HIM. HARDLY THE BLOCKS UPON WHICH TO BUILD REASONABLE COMMUNICATIONS. MANY RESPONSIBLE PEOPLE HAVE PLEADED FOR A RETURN TO ONE MINUTE OF SOLID COPY FOR ALL CODE

PAGE SIX

RESPONSE TO NPRM DOCKET WT 98-143

BY LELAND W. AURICK, W1SE

FOOTNOTES  
SEP 21 1998  
RECEIVED

EXAMINATIONS, AND IT IS ONCE AGAIN SUGGESTED THAT THIS ACTION, ALONE, WOULD BE IN THE BEST INTERESTS OF THE SERVICE, IN A VERY MATERIAL WAY.

PETITIONER HAS SOME SUGGESTIONS THAT WILL ACCOMPLISH THE COMMISSION'S OBJECTIVES OF REDUCING THE NUMBER OF LICENSE CLASSES, AND COULD ALSO PROVIDE THE DESIRED STIMULATION.

THE TECHNICIAN PLUS LICENSE.

ADD ADDITIONAL QUESTIONS, COVERING HF OPERATION, TO THE PRESENT TECHNICIAN PLUS LICENSE, AND KEEP THE CODE SPEED REQUIREMENT AT 5-WPM. ALL PRESENT PRIVILEGES TO BE RETAINED. GRANT VOICE PRIVILEGES IN THE PRESENT 40-METER NOVICE CODE SEGMENT. 75-METER VOICE PRIVILEGES WOULD BE RESERVED FOR GENERAL AND HIGHER CLASS LICENSEES. THIS PROVIDES SOMETHING TO WORK FOR. LAME-DUCK NOVICES TO BE GRANTED THE SAME PRIVILEGES AS LONG AS THEIR LICENSES ARE MAINTAINED. ONCE ALLOWED TO EXPIRE, THEY WOULD NOT BE RENEWED. CONTINUE THE PRESENT TECHNICIAN CLASS LICENSE, AND PRIVILEGES, AS A LAME-DUCK. ONCE PERMITTED TO EXPIRE IT WOULD NO LONGER BE RENEWED. ELIMINATE ISSUING NEW NOVICE AND TECHNICIAN CLASS LICENSES.

THIS TECHNICIAN PLUS CLASS LICENSE, TO BE RENAMED, WOULD BE AN APPEALING CLASS OF LICENSE IN THE ABSENCE OF THE PRESENT TECHNICIAN CLASS LICENSE, WHICH DISTORTS ALL THINKING. WHY NOT CALL IT WHAT IT IS - THE COMMUNICATOR LICENSE?

IT WOULD BE THE FIRST STEP TO LEARNING HOW TO BE A MEANINGFUL COMMUNICATOR. THE ESTABLISHMENT OF SUCH A CLASS OF LICENSE WOULD REAFFIRM TO ALL THAT THE WAY TO BECOME AN AMATEUR RADIO OPERATOR, AND EARN HF PRIVILEGES, IS THROUGH THE APPLICATION OF SOME TIME AND EFFORT IN LEARNING TO BE A COMMUNICATOR. ONE THING THAT WE DO NOT NEED IS ADDITIONAL HF VOICE PRIVILEGES THAT ARE NOT EARNED. MANY AMATEUR VOICE-FREQUENCY SUB-BANDS HAVE BECOME CROWDED ALMOST TO THE POINT WHERE EFFECTIVE COMMUNICATION IS IMPOSSIBLE.

PAGE SEVEN

RESPONSE TO NPRM DOCKET WT 98-143

BY LELAND W. AURICK, W1SE

FOUO  
SEP 21 1998  
RECEIVED

OPENING THE GATES TO VIRTUALLY UNLIMITED HF OPERATION WOULD PERHAPS SOUND THE ALARM TO ABANDON AMATEUR RADIO AS OF LITTLE MORE USE THAN THE CITIZEN BAND. NO CONCERNED CITIZEN WANTS THAT.

THE GENERAL, ADVANCED AND AMATEUR EXTRA CLASS LICENSES SHOULD BE RETAINED AS PRESENTLY CONSTITUTED, AND WITH THE SAME PRIVILEGES. ADOPTION OF THE SUGGESTIONS ABOVE WOULD ACCOMPLISH THE SEVERAL OBJECTIVES THE COMMISSION SOUGHT IN THE SUBJECT NPRM.

- 1) ELIMINATION OF TWO CLASSES OF LICENSE.
- 2) A MILD RESTRUCTURING OF THE ONE LICENSE CLASS WHICH WILL FOCUS ATTENTION ON THE PURPOSE OF THE AMATEUR RADIO SERVICE. THIS CLASS OF LICENSE COULD PROVIDE THE STIMULATION TO BRING AMATEUR RADIO INTO THE NEXT CENTURY.

WITH THE ADOPTION OF THESE SUGGESTIONS, MANY GAIN, AND NO ONE LOSES, EVEN IN THE APPEARANCE OF THE LOWERING OF HIS LICENSE STANDARDS. WITH THE ARRL PROPOSAL, AS WELL AS THE SUBJECT NPRM, EVERYONE LOSES SOMETHING.

A FINAL POINT. THE COMMISSION SHOULD NOT BE CONCERNED WITH WHAT OTHER ADMINISTRATIONS DO WITH THEIR AMATEUR RADIO OPERATORS. IN THIS COUNTRY, THE BASIS AND PURPOSE OF AMATEUR RADIO IS UNIQUE. NO OTHER COUNTRY HAS THE SAME STRUCTURE AS WE. WE SHOULD NOT TRY TO EMULATE THEM. WE HAVE THE VERY BEST AMATEUR SERVICE, AND IF WE ARE SMART, WE WILL KEEP IT THAT WAY.

RESPECTFULLY SUBMITTED,

*Leland W. Aurick*

LELAND W. AURICK, W1SE  
1043 DEER RUN ROAD  
WINTER SPRINGS, FL 32708

SEPTEMBER 15, 1998